

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ORGANIZED COMMUNITIES AGAINST)	
DEPORTATIONS, IMMIGRANT)	
DEFENSE PROJECT, and CENTER FOR)	
CONSTITUTIONAL RIGHTS,)	
)	
Plaintiffs,)	No. 21 C 2519
)	
v.)	Judge Blakey
)	
UNITED STATES IMMIGRATION AND)	
CUSTOMS ENFORCEMENT,)	
)	
Defendant.)	

AFFIDAVIT IN SUPPORT OF MOTION OF EXPEDITED RELEASE OF RESPONSIVE
DOCUMENTS

I, Genia Blaser, declare pursuant to 28 U.S.C. § 1746 and subject to the penalties of perjury, that the following is true and correct:

1. I am a Supervising Attorney at the Immigrant Defense Project (“IDP”). IDP is a non-profit organization whose mission is to promote fundamental fairness for immigrants accused or convicted of crimes. IDP works to protect and expand the rights of immigrants who have contact with the criminal legal system, including: 1) working to transform unjust deportation laws and policies; 2) minimizing the harsh and disproportionate immigration consequences of contact with the criminal legal system; and 3) educating and advising immigrants, their criminal defenders, and other advocates. IDP disseminates information about the immigration system to the public in accessible ways and is a leader in providing training and support for legal practitioners, community-based organizations, and community members. IDP provides expert information and community-based education on Immigration and Customs Enforcement (“ICE”) tactics, including surveillance practices, and possible legal and policy remedies. IDP’s office and principal place of business is in New York, New York.
2. As an employee of Plaintiff IDP in this litigation, I make this statement in support of Plaintiffs’ Motion for Expedited Release of Responsive Documents.
3. For close to a decade, IDP has monitored ICE policing and arrest tactics, and has used the information we’ve gathered to create and disseminate Know Your Rights materials for immigrant communities and advocates to be informed in case they have contact with ICE. IDP’s materials are based on the over 1600 reports of ICE arrests or attempted arrests that we have tracked and verified. IDP works closely with advocates and organizers, such as

fellow Plaintiff, Organized Communities Against Deportation (“OCAD”), to share this information such that they can use it in their organizing work with communities.

4. IDP’s Know Your Rights materials have been disseminated throughout the United States. They are used and distributed by elected officials, government agencies, community organizations, unions, legal service providers, and public defenders.
5. In my capacity as Supervising Attorney, I co-lead IDP’s ICE tracking and Know Your Rights work, breaking down the tactics that we see happening in practice, analyzing training and other materials that have been received through FOIA requests or other litigation, and creating accessible community-facing materials and resources.
6. In July 2020, IDP with our co-Plaintiffs, OCAD and the Center for Constitutional Rights (“CCR”), filed a FOIA request seeking expedited processing of information about ICE’s Citizens Academies, including the one which had been announced to be held in Chicago, IL. We requested this information because it was and remains strongly in the public interest to have information, including the budget, trainings, and other information, about a program funded by Congress for so-called community stakeholders who are handpicked by ICE to be trained about their policing and arrest practices, including trainings in “defensive tactics, firearms familiarization and targeted arrests.”¹
7. When we filed the request in July 2020, we asked that it be expedited because we have a compelling need to share information regarding ICE’s Citizens Academy programs with the public. This urgency continues to date, yet we have not received a single document. ICE has held numerous Citizens Academies over the years², and it remains crucial to the public understandings of the workings of ICE, of whom is being selected to participate in these “academies”, and how Congress is appropriating money towards DHS. The Citizens Academy programs, while allegedly for stakeholders of communities and touted as such, has remained shrouded in secrecy.
8. At a time when anti-immigrant sentiments remain increasingly high in the midst of an on-going global pandemic, this information remains more important to disseminate than ever. Citizens Academy programs tout trainings on defensive tactics, firearms familiarization and targeted arrests. Both our elected officials and the public have a right have more information about this.
9. This information is additionally time sensitive so that local government can know who is being trained in policing and military-style tactics, and for IDP and community organizations to accurately advise community members about their rights during immigration policing activities. For legal services providers, this information remains

¹ Chantal Da Silva, *ICE Offering 'Citizens Academy' Course with Training on Arresting Immigrants*, NEWSWEEK (July 9, 2020), <https://www.newsweek.com/ice-launching-citizens-academy-course-how-agency-arrests-immigrants-1516656>.

² *Citizens Academy: Inviting Participants from Local Communities to Learn More about HSI*, U.S. IMMIGR. AND CUSTOMS ENFORCEMENT (last updated Jan. 8, 2021), <https://www.ice.gov/outreach-programs/citizens-academy>.

urgent so they can know what kinds of policing actions their clients might be exposed to in the course of their legal representation, and so that they themselves can educate their clients and raise appropriate defenses. And, for community members, it remains important so they can engage in a timely fashion with their federal elected officials over budgetary appropriations to DHS.

10. To date, we have not received a single document.

11. Without the immediate release of this information IDP's ability to conduct advocacy and community education around ICE policing tactics is seriously impeded.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 11, 2022



Genia Blaser